

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA

Michael Gibson

(In the space above enter the full name(s) of the plaintiff(s).)

REC'D JAN 23 2025

- against -

CITY OF Philadelphia; and
"Ofc" Gerard Brennan and "dist"
"Ofc" Carolyn Young and "dist"
"Ofc" Sgt Richard Sharp and "dist"
"Ofc" CPL Brooks and "dist"
"Ofc" Sgt William Yancer IAD
"Ofc" Capt Pasqual Agazzino IAD
"Ofc" "INSP." George J. Kappe IAD
Director of Investigations Jamison Rogers C.P.O. "off" and "inv" CAP

COMPLAINT

Jury Trial: ☒ Yes ☐ No

(check one)

JURY TRIAL Demanded,
Retiling after dismissal
without Prejudice.

(In the space above enter the full name(s) of the defendant(s). If you cannot fit the names of all of the defendants in the space provided, please write "see attached" in the space above and attach an additional sheet of paper with the full list of names. The names listed in the above caption must be identical to those contained in Part I. Addresses should not be included here.)

I. Parties in this complaint:

- A. List your name, address and telephone number. If you are presently in custody, include your identification number and the name and address of your current place of confinement. Do the same for any additional plaintiffs named. Attach additional sheets of paper as necessary.

Plaintiff	Name	Michael Gibson
	Street Address	2130 N. VAN PELT STREET
	County, City	Philadelphia, Philadelphia
	State & Zip Code	PENNSYLVANIA 19121
	Telephone Number	267-370-4152

- B. List all defendants. You should state the full name of the defendants, even if that defendant is a government agency, an organization, a corporation, or an individual. Include the address where each defendant can be served. Make sure that the defendant(s) listed below are identical to those contained in the above caption. Attach additional sheets of paper as necessary.

Defendant No. 1

Name City of Philadelphia
 Street Address 1515 Arch Street 17th Floor
 County, City Philadelphia, Philadelphia
 State & Zip Code Pennsylvania 19102

Defendant No. 2

Name "Ofc" Gerard Brennan
 Street Address 400 N. Broad Street
 County, City Philadelphia, Philadelphia
 State & Zip Code Pennsylvania 19130

Defendant No. 3

Name "Ofc" Carolyn Young
 Street Address 400 N. Broad Street
 County, City Philadelphia, Philadelphia
 State & Zip Code Pennsylvania 19130

Defendant No. 4

Name "Ofc" Sgt Richard Sharp
 Street Address 400 N. Broad Street
 County, City Philadelphia, Philadelphia
 State & Zip Code Pennsylvania 19130

II. Basis for Jurisdiction:

Federal courts are courts of limited jurisdiction. Only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case involving the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one state sues a citizen of another state and the amount in damages is more than \$75,000 is a diversity of citizenship case.

- A. What is the basis for federal court jurisdiction? (check all that apply)

☒ Federal Questions

☒ Diversity of Citizenship

- B. If the basis for jurisdiction is Federal Question, what federal Constitutional, statutory or treaty right is at issue?

1st amendment right of freedom of speech, expression
Freedom from retaliation for exercising 1st amendment
rights. 4th amendment violation unreasonable seizure

23-4227 KSM

B ATTACHMENT

DEFENDANTS LIST

PART I

DEFENDANT NO. 5 "OFC" CPL. BROOKS 22ND "DIST"

STREET ADDRESS 400 N. BROAD STREET
COUNTY, CITY Philadelphia, Philadelphia
STATE, ZIP CODE PENNSYLVANIA 19130

DEFENDANT NO. 6 NAME "OFC" WILLIAM YANCER IAD

STREET ADDRESS 400 N. BROAD STREET
COUNTY, CITY Philadelphia, Philadelphia
STATE ZIP CODE PENNSYLVANIA 19130

DEFENDANT NO. 7 NAME "OFC" PASQUAL AGOZZINO IAD

STREET ADDRESS 400 N. BROAD STREET
COUNTY, CITY Philadelphia, Philadelphia
STATE, ZIP CODE PENNSYLVANIA 19130

DEFENDANT NO. 8 NAME OFC "Insp" GEORGE J KAPPE IAD

STREET ADDRESS 400 N. BROAD STREET
COUNTY, CITY Philadelphia Philadelphia
STATE ZIP CODE PENNSYLVANIA 19130

DEFENDANT NO. 9 NAME DIRECTOR OF INVESTIGATION JAMISON

ROGERS C.P.D.C.

STREET ADDRESS 1515 Arch Street 11th FL
COUNTY, CITY Philadelphia Philadelphia
STATE ZIP PENNSYLVANIA 19102

B, continued Federal Constitutional statutory, treaty "RT" at issue of evidence, 5th amendment violation of right to due process, and right to not be subjected to government, threats, intimidation or coercion, to bypass legal procedure, 4th amendment violation, unreasonable seizure of evidence, by coercion and collusion, 14th amendment right violation of equal protection under the law and due process.

C IF THE basis for jurisdiction is diversity of citizenship, what is the state of citizenship of each party
 Plaintiff's state of citizenship Pennsylvania
 Defendant's states of citizenship unknown
 Presumption of Diversity of citizenship.

JURISDICTION AND VENUE

1 Subject matter jurisdiction is conferred upon this Honorable Court by 28 USC § 1337 relating to "any civil action or proceeding arising out of any act of Congress regulating commerce, 28 USC § 1343 (4) and 28 USC § 1331, 42 USC § 1983 and 42 U.S.C. § 1985.

2. Basis OF JURISDICTION

Basis for jurisdiction is this Court has supplemental jurisdiction over the related state law claims pursuant to 28 USC § 1367 (a) because these claims form a part of the same case, or controversy, under article III of the United States Constitution. Plaintiff's state law claims share all the common operative facts with his federal law claims, and the parties are identical.

3. Resolving Plaintiff's federal law claims in a single action, serve the interest of judicial economy, convenience, consistency, and fairness to the parties.

4. The Court properly maintains personal jurisdiction over Defendants because Defendants' contacts with this state and this judicial district are sufficient for the exercise of jurisdiction over Defendant to comply with traditional notions of fair play and substantial justice, thus satisfying the standard set forth.

23 - 4227 KSM

by the United States Supreme Court
IN INTERNATIONAL SHOE CO V. WASHINGTON
326 US 310 (1945) and its progeny

5. Venue is appropriately laid in The United States District Court for The ~~EASTERN~~ DISTRICT OF PENNSYLVANIA pursuant to 28 USC § 1391 (b) (2) inasmuch as all parties regularly conduct business within This district, and the act complained by The Plaintiff arose herein.

III Statement of Claim

6. Plaintiff hereby incorporates The prior and subsequent paragraphs of This Complaint, as though fully set forth at length.

7 Michael Gibson (hereinafter Plaintiff) hereby files this complaint ^{pro se} alleging 42 USC § 1983 "Equal Protection Violation", 14th amendment due process, 42 USC § 1985 "Conspiracy to Interfere with civil rights, LIBEL, 1st amendment 'Retaliation' for exercising 1st amendment right, freedom of speech, expression right to petition government."

False Claims Act (31 USC § 3729) "violation"

- 8 Plaintiff realleges, adopts and reasserts his pleadings, statement of claim & statements of factual allegations in second amended complaint.
- 9 These pleadings are in paragraphs 7 thru 160 respectfully.
- 10 Plaintiff asserts, that the adoption of his pleadings in his second amended complaint is not piecemeal, but a necessity due to the complexity of the conspiratorial extraordinary circumstances involving powerful public officials manipulating events, to change the outcome of this case.
- 11 the adoption of pleadings in Plaintiff's second amended complaint is a necessity for the clarification of these events.

12. Plaintiff is a 75-year-old disabled Black man of a protected class.
13. The City of Philadelphia is a municipality of the Commonwealth of Pennsylvania with a local office address of 1515 Arch Street 17th Floor.
14. Defendant owns, operates, manages directs and controls the Philadelphia Police Department ("PPD") the police Internal Affairs Division ("IAD"), Philadelphia Police Oversight Commission ("CPOC") whose agents, servants and employees at all times were acting within the course and scope of their employment, under the color of state law and operating pursuant to official policies, customs or practices of their agencies.
15. Plaintiff brings forth this complaint, the January 23, 2023 "IAD" investigative report, final finding and disposition of Plaintiff's allegation of police misconduct.

A PLAINTIFF brings forth the actions of CPOC's investigations director Jamison Rogers a former Chester County P/O and detective, his investigative involvement, and handling of two separate police excessive force complaints.

16 The first event giving rise to PLAINTIFF'S claim arose at and with the police IAD division on January 23, 2023 at the completion of Sgt William Yancer's investigation

17 After a long wait and persuasion by PLAINTIFF to CPOC Jamison Rogers Investigator, former Chester police officer, Detective director of investigations for the CPD.C., PLAINTIFF received the report around JAN 5, 1030 AM

18 The second event giving rise to rise to PLAINTIFF'S claims arose August 7, 2024 when PLAINTIFF received a Email regarding his complaint request to the City Council Chief of Staff Elshafiyg Ali of council's 5th district as to information from the CPD.C investigator Director Jamison Rogers as to why PLAINTIFF received

NO disposition or district control number was issued or given to Complainant, the Plaintiff in this case by the police or the CPOC.

19 This was an violent assault and battery on the plaintiff, a 74 year old disabled black man exercising his constitutional rights to file a grievance guaranteed by the 5th amendment & due process clause.

C FACTUAL BACKGROUND

JANUARY 23, "IAD" INCIDENT INVESTIGATION

20 Plaintiff incorporates the prior and subsequent paragraphs in this complaint as though fully set forth at length.

upon reviewing the "IAD" memorandum Plaintiff saw it was egregious, appalling, defamatory, degrading and laden with fraudulent statements,

- 21 INACCURACIES SO VILE, OUTRAGEOUS
IT EXHIBITED RACIAL HATRED AND
ANIMOUS,
- 22 IN THIS MEMORANDUM, SGT WILLIAM YANCER
SOUGHT TO MAKE PLAINTIFF LOOK LIKE
A LIAR, A MENTALLY ILL PERSON, THAT
WAS IRRATIONAL.
- 23 SGT. WILLIAM YANCER FRAUDULENTLY
MISREPRESENTED MULTIPLE MATERIAL
FACTS, OMITTING THE NUMBER OF POLICE INVOLVED.
- 24 HE STATED PLAINTIFF WAS THE AGGRESSOR
DURING THE TIME OF THE INCIDENT.
- 25 YANCER DENIED ANY ASSAULT, BATTERY
ILLEGAL RESTRAINT, EXCESSIVE FORCE
THREAT OF DEADLY FORCE, OR
FALSE IMPRISONMENT OF PLAINTIFF
TOOK PLACE.
- 26 NEARLY EVERY STATEMENT OF THIS
"OFF" SGT WILLIAM YANCER WAS FRAUDULENT
CONCEALMENT AND A CONSPIRED COVER UP
OF WHAT ACTUALLY OCCURRED JAN 20, 2015.

27 P/O Yancer and Agazzino did purposefully discriminate against plaintiffs on the basis of race.

They did not simply omit names in their report or simply mischaracterize occurrences, as court interpreted.

28 Both Yancer, Agazzino conspired to conceal and cover up Federal crimes and civil rights violations of Plaintiffs 4th 14th 5th 1st amendment right by a not two police officers and written down in an official police investigative report.

29 Both men under the color of Law injected inferences, that involved the FBI that was not true.

30 This is a Federal crime statute 1001.

They both were in collusion collaborated agreement on their lies & fraudulent misrepresentation fraud concealment and that they both fabricated that

I the victim of police brutality stated that the FBI staged a sexual discrimination lawsuit on me.

31. Van der Laan fabricated the statement, that I was certain the FBI were intercepting my documents personal files from Philadelphia multiple agencies.

32. The plaintiff did state that documents were intercepted by the city solicitors Nicole Morris Frank Wehr, and present U.S. District Court Magistrate Judge Craig Straw has detailed knowledge of this occurrence.

33. It is plaintiff's presumption that true material facts of what occurred regarding plaintiff's documents in the law dept, in the hands of city solicitors, some of whom were former US attorneys, such as Anne Taylor Nicole Morris, I presume was made known to judges US attorney prosecutors and other colleagues in this United States Eastern District Court.

Off IAD police officials Sgt Yancer Capt Agazzino, both were in agreement with the statements made, collaborated on in their January 23, 23 memorandum and acceptance approval by IAD head of Internal Affairs Officer Inspector George J Rappe who signed off on their findings is conspiracy to interfere in Plaintiffs civil rights.

35 Where in 455 of the due process clause, 14th amendment equal protection, 15th amendment right to be free from retaliation from government officials, was violated.

36 Their actions, fabricated defamatory statements, are not just libel but an ongoing conspiracy to achieve an ends.

37 Every statement Plaintiff made to Yancer in the documented recorded interview are the true material facts they conceived.

38 Upon receiving this memorandum
 from CPOC Director of investigations
 I was appalled at its contents

39 This treatment of plaintiff was
 disparate racially discriminatory,
 which is a pattern of the way
 police conduct business when it
 involves Black citizens, i.e. DOB v Phila,

40 Upon discussion with CPOC Director
 Jamison Rogers, who was head of
 investigation, it found out he too
 was in agreement that my allegation
 of the 2015 of Feb 20 was
 unfounded.

41 The conspired cover up of this incident,
 which resulted in the permanent loss
 of my beloved sister Debra Gibson
 was not only appalling but
 outrageous intentional harassment,
 intimidation, of injured crime
 victim, whistle blower on
 police corruption in violation
 of whistle blower laws, plaintiff's
 1st amendment rights, 14th equal
 protection, 455 Due process clause.

42 They 22ND district Sgt Robert Sharp
IAD Sgt William Yancey, CAPT
Aguzzino conspired and corroborated
their fraudulent account of the event
which occurred on February 20 2015.

43 Their commanding officer head of
"IAD" OFC INSP George V Kappe
who signed off on this January
23/23 memorandum is equally guilty
of violation of Plaintiff's 1st
amendment rights and well as Plaintiff
14th amendment rights of equal protection

44 22ND District reporting officers
Gerard Brennan and OFC Carolyn
Young are equally guilty of
violation of Plaintiff's 14th
amendment right of equal protection
and due process despite declining
to give statements

45 Plaintiff asserts that all of these
officers fraudulent concealment a
state law claim falls under Federal

- 46 Jurisdiction, thru continued conspiracy and as a matter of LAW 28 USC § 1367 because these claims share, form a part of the same case or controversy under article III of the United States Constitution.
- 47 They share the same operative fact with Plaintiff's Federal Law Claims.
- 48 In particular 42 USC § 1983 part of the Civil Rights Act of 1871, protects whistle blowers from retaliation by public official for disclosing constitutional violations such as plaintiff has exercised during these outrageous circumstances.
- 49 On or around February 3-2023 plaintiff requested a disposition of the investigative findings of CPDC.
- 50 Plaintiff communicated with the CPDC Director of Investigation's Jamison Rogers.

CPOC February 2023 October 2024 INCIDENTS

- 51 After numerous phone conversations with CPOC Director of Investigations during the 1st week of February 2023, the issuance of The "IAD" memorandum of Their Findings it became evident to Plaintiff Jamison Rogers was in concert with The police in "IAD" Sgt William Yancer, Capt. Pasqual Nozzino and "Insp." George J Kappe.
- 52 When during these interaction with Rogers, I requested aspects of his investigative review, of his investigative determination Roger too stated he and the CPOC were in agreement with the above indicated officers.
- 53 Rogers specified Plaintiff's allegations of public corruption, police brutality inaction of the 8 police officers allowance of the abduction of Plaintiff incapacitated sister under the threat of deadly force was unfounded.

- 54 JAMISON ROGERS IN THIS CONVERSATION
EXPRESSED SENTIMENT THAT WAS UNWAVERING
- 55 AFTER PLAINTIFF ELABORATED ON HOW IAD'S
INVESTIGATOR SGT WILLIAM YANCERS
INVESTIGATORY CLAIMS OF STATEMENTS
HE SAID I MADE IN A RECORDED
INTERVIEW WAS NOT ONLY APPALLING
OFFENSIVE TO ME AS A VICTIM OF
POLICE BRUTALITY, BUT DETAMATORY
DEGRADING AND HUMILIATING
- 56 ROGER'S RESPONSE WAS "DO YOU
WANT TO BE REFERRED TO SOMEONE
FOR PSYCHIATRIC HELP."
- 57 ROGER'S RESPONSE TO PLAINTIFF WAS
CLEARLY MIRRORING SGT YANCERS
DEGRADING FRAUDULENT STATEMENT
THAT PLAINTIFF STATED IN THE RECORDED
INTERVIEW AS IN HIS REPORT "MICHAEL
GIBSON STATED HE HAS BEEN SEEN BY
DOCTORS AND PSYCHOLOGISTS FROM ALL
OVER THE WORLD, WHO ARE ABLE TO
VALIDATE HIS BELIEFS"

- 58 CPDC's investigator Roger collaboration with IAD ~~OFFICIAL~~ Sgt Ymer, Capt Agozzing and head of IAD "INSP. George J Kappe is a clear violation of plaintiff's amendment rights to equal protection due process, due to his failure to fair due process investigating PLAINTIFFS' complaints of police misconduct.
- 59 Roger of the CPDC has violation Plaintiff's due process rights by not only colluding with IAD ~~OFFICIALS~~ Plaintiff implicated in prior paragraphs and documented pleadings but has in his correspondence to ten of his staff at the CPDC exposed his collaboration with assistant district attorney Brett Zakeosian of the special investigation unit of the DA's office.
- 60 Roger has abused his position of power in an overt act of

- 61 conspiracy to interfere with plaintiffs right to due process, equal protection as well as plaintiffs 1st amendment right to file grievance against government officials, who engage in public corruption,
- 62 IT IS PLAINTIFF PRESUMPTION ROGERS actively participated in official oppression failing to review evidence that is inculpatory against the defendant police officers
- 63 Roger recently boast when he came into position as CPD's 1st director of Investigations to channel 6 abc news Christie Heto "there was no investigative capacity at this level before he arrived."
- 64 Roger statement to new reporter on television channel 6 abc news -

- 65 Pac did have some investigators, but again the amount of authority at the time does not compare to where we're at now" said Rogers.
- 66 Rogers stated, "authority would include things like recommending charges and subpoena powers."
- 67 Rogers also stated on ABC news, that if IAD sent a report to them and they see missing pieces, "they can send it back and ask them to take a second look at it" he added.
- 68 Since the debut of the CPDC, the commission has been allocated more than 3 million dollars in taxpayer money.
- 69 It has been reported that the CPDC has not yet independently investigated not one complaint of police misconduct.

- 70 Plaintiff has openly stated before City Council members, Philadelphia citizens at the June 18 2024 City Council hearing, that I stated there is public corruption in the police department.
- 71 Plaintiff stated there is abuse of power by police officials in high positions and that Plaintiff was recently assaulted in the lobby of the 2nd district police station.
- 72 Plaintiff stated to Philadelphia citizens and city council, that they are doing everything to stop him from testifying in Federal Court.
- 73 Plaintiff stated he had been threatened, intimidated, attacked, and injured to the point he suffers every day and night from the officer inflicted pain on him a 74 yr. old man, whose only effort was exerting his constitutional rights.

FALSE CLAIMS ACT VIOLATION

74 Plaintiff alleges, that from his knowledge belief and observation and interactions with CPOC director JANISON ROGERS Plaintiff received no help whatsoever when he reached out to this city official about a prior incident of police misconduct and most recently for assault and battery on him the Plaintiff while exerting his 1st amendment right to file a criminal complaint.

75 Instead of assistance from JANISON ROGERS Plaintiff was met with indifference,

76 Plaintiff has observed this city official siding with the police investigative officer at FPD and most recently a assistant District attorney,

This is misappropriation of government funds, when service is not rendered.

77 CPOC Director Jamison Rogers actions is a far cry from his statement to abc new publicly broadcasted,

78 IT is my presumption from his fraudulent statements to his correspondence, indicates he Jamison Rogers has colluded with with a assistant district attorney and the police in a conspiracy to deprive my constitutional rights to equal protection and due process

79 Jamison Rogers also sent this defamatory character damaging fraudulent correspondence to city council Young chief of staff EL shafiq ALI where he stated he was working with the district attorney's office regarding Plaintiff's complaints on police.

80 This official's action is a clear violation of the False Claims Act wherein, an municipal employee makes a false claim to the government he knows is false to gain power or promotion

- 81 On May 31 2024 9:49 AM Director of Investigation at CPDC Jamison Rogers emailed approximately 7 of his staff this correspondence,
- 82 In part it stated Good morning Team, we are all familiar with Mr Gibson's frequent calls to this office regarding numerous unfounded complaints. S.
- 83 Some of you may also be aware he has been contacting the US Attorney's Office as well as the District Attorney's Office.
- 84 It goes on to say I the Plaintiff have been harassed by the DA's Office.
- 85 He referring to a ADA in the special investigation unit.
- 86 The ADA he is referring to is ADA Brett Zakeosian.

- 87 ON The 14th day of April 2023 Plaintiff Email CPOC Director of investigation a 8 page document of uns worn testimony as to the public corruption in the DPD and the IAD on the cover up of the TRUE material Facts of what occurred Feb 20 2015 when Plaintiff called 911 for assistance in a home invasion.
- 88 Plaintiff detailed what occurred on that document which I Emailed to him and he acknowledged he received it
- 89 Plaintiff also Email the Police Commissioner as well as City Solicitor Diana Cortes with a Formal Demand Letter because Plaintiff evidentiary document sent to both City Solicitor Christopher Ryder and Mayor Kenney was illegally intercepted.
- 90 The Employment Labor Unit City Solicitors wherein Ryder who was handling Plaintiff Pennsylvania Human Relation Discrimination Case against the City Plaintiff Filed denied ever having received until Plaintiff went

to the Office of the FBI, and while there a text message was sent to Plaintiff phone by city solicitor Grant wehr stating he found Documents.

91 Plaintiff was aware that city solicitor Diana Cortes was a assistant district attorney in the Philadelphia DA's Office.

92 5 month later, upon inquiry as to the criminal complaint regarding attorney's and sabotaged complaint regarding police Excessive Force and its coverup & the plaintiff was assisted by Ezekiel Cortes

93 IT is Plaintiff's presumption he is a relative of City Solicitor Diana Cortes.

This incident is currently being coverup in a continuing conspiracy by IAD officials ADA Zakeosian and CPOC JAMISON ROGERS.

- 94 These intentional actions of the police official I have implicated, have violated Plaintiff's 14th Amendment rights, 1st Amendment rights, 45500e Process rights in violation of TITLE VI of Civil Rights Act of (1964)
- 95 P/O C/P Brooks by not assigning a DC number (as is a police departmental requirement) violated the above named civil rights of Plaintiff
- 96 Sgt William Yancer, of IAD as well "Cpl" Raymond Sagessi; who has denied any body cam footage of Cortes assault on Plaintiff exist,
- 97 Aguzzino a corporal in IAD violated all of the civil rights of Plaintiff specified in the aforementioned above paragraphs.
- 98 Because of this overt act, of ongoing conspiracy to interfere in Plaintiff's civil rights by these official Plaintiff is declining to name Sagessi Cortes as defendant until

- 99 which time, Plaintiff can have D.A. Larry Kinsner, a special prosecutor of the Attorney General's Office on the Department of Justice investigate this entire matter.
- 100 Plaintiff asserts all of the aforementioned and alleged actions of each of these 9 individuals defendants violated and are still in violation of Plaintiff's equal protection, rights, due process rights
- 101 Plaintiff asserts the actions of each named defendant in these pleadings establish a discriminatory effect,
- 102 were motivated by discriminatory purpose,
- 103 Plaintiff asserts he is 75 yr old Black man with multiple disabilities of a protected class
- IN all Plaintiff's interaction with these defendants Plaintiff was

104 Denied due Process by each and every of the named defendant number 1 Thru defendant #9.

105 By conspiring to conceal inculpatory evidence of police misconduct, police excessive force, which recently injured plaintiff in a fashion he still suffers from the injury of torturous assault and torturous Battery.

106 Plaintiff is hindered from and obstructed from obtaining due process.

107 Plaintiff alleges and asserts that each and every defendant #1 thru defendant #9 engage in conspiracy to interfere with plaintiff's 1st 4th 5th and 14th amendments rights.

108 They did so with racial animus, and were motivated by either discriminatory intent in violation of the above stated rights in seeking a gain in power or promotion in the form of kickbacks,

BR

- 109 equal protection is typically not a requirement when the defendant conspired to interfere with rights.
- 110 Jamison Rogers stated in his correspondence to City Council member Jeffrey Young's Chief of Staff, that he was working with the District Attorney's Office, where himself and the ADA were in agreement. Rogers forwarded City Council Chief of Staff EL ALL documents to Keosian coerced Plaintiff to sign.
- 111 Plaintiff drafted a Formal Revocation of that waiver, which Plaintiff has already stated in previous pleadings to the Federal Judge in this case.
- 112 Plaintiff will submit after he refutes his case.
- 113 IT IS PLAINTIFF'S presumption Former Chester County Police / Detective was compensated for not investigating Plaintiff's claims.
It is Plaintiff's presumption he adhered to the Blue wall of silence and was compensated with a position -

114 as chief of staff at the sheriff's
office,

115 The CPOC which Rogers was hired as
Director of Investigation did nothing
for the tax paying citizens of
Philadelphia.

116 When a municipal entity purports
to provide a service at the expense
3 million in tax payer money, it
IS FRAUD.

117 It is not only FRAUD when services
are not rendered, it is criminal
when agents of that agency violate
the state and federal laws,
violation of citizens rights.

118 Rogers proclaimed Plaintiff submitted
fraudulent claims thru agency
to all his staff.

The ADA he colluded with admitted
to Plaintiff the Body Cam Footage
of PO Ezekiel Cortes shows

119 The officer did put his hand on
Plaintiff.

120 Shortly thereafter Rogers submitted
the fraudulent claim to a government
officials that nothing occurred.

121 This is clear violation of the False
Claim Act.

122 Especially when the agency he
represented received 3 million
in City of Philadelphia tax
payer money.

123 From the Plaintiff's observation there appears
to be a pattern of rewarding officers that
remain silent in police misconduct cases.

124 The Department of Justice revealed in
its case the DOJ v the City of
Philadelphia encompassing police abuse
unconstitutional practice and that
the DPD had a pattern of police abuse.
ie Bailey et al v City of Philadelphia filed
by ACLU showed Black AND Latino men
were disproportionately targeted.

- 125 ON September 20, 2023 plaintiff went to the 22nd District Police Station to inquire as to why his criminal complaint for fraud was not sent to central detectives.
- 126 Plaintiff after 4 hours spoke to an officer requesting the disposition.
- 127 Plaintiff was given none and was assaulted by this officer, Plaintiff requested a supervisor and a officer came down stairs to front window.
- 128 it was officer named Cpl. Brooks, a woman officer, I had previously spoken to regarding police misconduct of officers at her district.
- 129 This officer refused to take my statement as to what just occurred. Ofc Brooks gave me an envelop with the officer's name that assaulted me, his badge number, but no DC number.

130 Plaintiff alleges that on September 20 2023 after he was assaulted in the 22nd District Police Station by Ezekiel Cortes, the Supervisor Cpl Brook refused to write a report, despite plaintiff informing her he was injured.

131 No District control number has been issued till this day.

132 Philadelphia Police Department Directive 12.18 issued 8/29/14 effective that date, updated 10/25/22 subject complaint on Police, states all complaint must be investigated by the supervising officer and the DPR office of professional responsibility.

133 Order states that the supervisor shall prepare a complaint or incident report (75-48) even if no complaint filed at the time of the incident.

134 Brooks lied to plaintiff re: forwarding criminal complaint to Central Detectives re: FRAUD.

Philadelphia Police: A HISTORY OF BRUTALITY

141 Plaintiff hereby incorporates the prior and subsequent paragraphs of this Complaint as though fully set forth at length.

Count I

42 USC 1983 "Equal Protection Violation" //

Count II

LIBEL

Count III

42 USC 1985 "Conspiracy to Interfere with Civil Rights"

Count IV

First Amendment "Retaliation"

Count V

FALSE CLAIMS VIOLATION

142 Plaintiff hereby incorporates the prior and subsequent paragraphs as though fully set forth at length.

IV. Injuries:

If you sustained injuries related to the events alleged above, describe them and state what medical treatment, if any, you required and received. Plaintiff has suffered from Defamation of Character

V. Relief:

State what you want the Court to do for you and the amount of monetary compensation, if any, you are seeking, and the basis for such compensation.

Wherefor Pro Se Plaintiff Prays the Honorable
for relief as follows, Michael Gibson humbly
ask the Honorable Court to grant damages against
the Defendants

- (a) Compensatory Damages for each count, determined by Court
- (b) Punitive Damages as determined by Jury Trial
- (c) Compensation for Emotional Distress, mental Anguish &
- (d) Attorney fees if Court pool attorney assigned
- (e) For Defendant to pay all Court cost
- & False Claims Act Awards.

Jury TRIAL in accordance with the PA constitution

I declare under penalty of perjury that the foregoing is true and correct.

Signed this 23 day of JANUARY, 2025.

Signature of Plaintiff Michael Gibson
Mailing Address 2130 N Van Pelt St
Philadelphia
Pennsylvania
Telephone Number 267 370 4153
Fax Number (if you have one) _____
E-mail Address Mikegi bb302007@gmail.com

Note: All plaintiffs named in the caption of the complaint must date and sign the complaint. Prisoners must also provide their inmate numbers, present place of confinement, and address.

For Prisoners:

I declare under penalty of perjury that on this _____ day of _____, 20____, I am delivering this complaint to prison authorities to be mailed to the Clerk's Office of the United States District Court for the Eastern District of Pennsylvania.

Signature of Plaintiff: _____
Inmate Number _____